

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

TEEN MODEL (a minor), by her parents,
PARENTS,

Plaintiffs,

v.

JASON LEE PARRY,
BLOOD IS THE NEW BLACK,
URBAN OUTFITTERS, INC., and
BRANDY & MELVILLE N.Y. INC.,

Defendants.

11 CIV. 5766 (GBD)

**DECLARATION OF
MICHELLE E. GOODMAN
IN SUPPORT OF
BRANDY & MELVILLE NY INC.'S
OPPOSITION TO MOTION TO
QUASH CERTAIN SUBPOENAS**

MICHELLE E. GOODMAN, hereby declares, under penalty of perjury pursuant to the laws of the United States, as follows:

1. I am an attorney at law duly licensed to practice in all courts of the State of California. I make this declaration based on my own personal knowledge, and if called and sworn as a witness, I could and would consistently testify hereto.
2. I am an associate at the law firm of Wolf, Rifkin, Shapiro, Schulman & Rabkin, LLP, counsel of record, admitted *pro hac vice* for defendant Brandy & Melville NY Inc. ("Brandy").
3. Attached hereto as **Exhibit A** is a true copy of documents produced by BCBG, pursuant to the subpoena that it received. BCBG produced these documents without serving any objections to the subpoena.

4. Attached hereto as **Exhibit B** is a true copy of documents produced by Versace, pursuant to the subpoena that it received. Versace produced these documents without serving any objections to the subpoena.

5. Attached hereto as **Exhibit C** is a true copy of two articles that I printed from the Internet regarding the public apology that Diane Von Furstenberg issued in late February 2011, after Plaintiff (then 15) participated in one of her fashion shows.

6. The subpoenas at issue in the Motion to Quash were served on each of the non-party recipients by **certified** U.S. mail. No subpoenas were served on nonparties by regular (non-certified) U.S. mail. Attached hereto as **Exhibit D** is a true and correct copy of the proofs of service on the nonparties, and certified mail receipts for each subpoena. Counsel for Plaintiff Teen Model ("Plaintiff") was served with a copy of the subpoenas by regular U.S. mail.

7. My office has been contacted by approximately 23 of the subpoena recipients. I have been handling the communications with them – most of which have been by telephone. The subpoena recipients have been generally understanding and cooperative about the process, and have stated to me that they will look for and produce their responsive documents. When a subpoena recipient has raised an issue with me regarding the subpoena, I have discussed it with them and worked out the issue informally.

EXECUTED: Los Angeles, California
December 16, 2011


MICHELLE E. GOODMAN